

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to: *Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al.*, 04-cv-1706 (GBD)(SN)

**MOTION TO ADD PARTIES AGAINST THE TALIBAN**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Jerry S. Goldman, Esq., along with the exhibits attached thereto, the O'Neill Plaintiffs and Additional Plaintiffs in the above-captioned matter, by and through their counsel, respectfully move that this Court:

1. Order that the underlying complaint is deemed amended to add the plaintiffs listed in Appendix 1 ("Additional Plaintiffs") as parties against the Taliban;
2. Order that the amendment supplements by incorporation into, but does not displace, the underlying complaint;
3. Order, in the alternative to amendment, that Additional Plaintiffs are added as plaintiffs to the above-referenced case against the Taliban through Rule 24 intervention;
4. Order that prior service, orders, and judgments entered in the case remain in effect as to all parties;
5. Order that all parties are bound by all prior rulings made in this case, including the Court's prior order on service by publication, ECF Nos. 445, 488;
6. Order that Case Management Order #2, ECF No. 247, ¶ 12 applies to Additional Plaintiffs such that re-service of the Taliban is not required;

7. Order that if any individuals have retained Anderson Kill P.C. between the filing of the Motion to Add Parties and one week following the date of an Order granting the Motion, that such individuals may be added to the Amended Complaint or Intervenor Complaint to be filed without further order of the Court and that the Order shall otherwise apply to their claims against the Taliban;

8. Order that Additional Plaintiffs shall file the Amended Complaint or, in the alternative, Intervenor Complaint (*see* Exhibits A and B to the Declaration of Jerry S. Goldman, Esq.) as a stand-alone document within one week of this Order; and

9. Granting such other and further relief that the Court deems just and proper.

Dated: New York, New York  
February 11, 2022

Respectfully submitted,

/s/ Jerry S. Goldman

ANDERSON KILL P.C.

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